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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22 BAY AREA PAINTERS AND TAPERS
23 PENSION TRUST FUND, et al.,

24 Plaintiffs,
25 v.

26 PACIFIC SHORES CONSTRUCTION
27 CORPORATION, a California Corporation,
28 Defendant.

Case No.: C14-4300 JST

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER THEREON**

Date: January 7, 2015
Time: 2:00 p.m.
Dept.: Courtroom 9, 19th Floor, San
Francisco, CA
Judge: Honorable John S. Tigar

**JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; ~~PROPOSED~~ ORDER
CASE NO.: C14-4300 JST**

1 Plaintiffs and Defendant, by and through their respective counsel of record, hereby
2 respectfully request that the Case Management Conference, currently scheduled for January 7, 2015,
3 be continued for approximately forty-five (45) days, or as soon thereafter as may be convenient for
4 the Court. Good cause exists for the requested continuance as follows:

5 1. As the Court's records will reflect, this action was filed by Plaintiffs on September
6 24, 2014 to compel Defendant's compliance with its obligations to pay monthly employee
7 contributions to Plaintiffs, along with payment of amounts found due in an audit inspection of
8 Defendant's payroll records, pursuant to the Collective Bargaining Agreement.

9 2. Defendant's filed an Answer to the Complaint on November 14, 2014.

10 3. Counsel for both Plaintiffs and Defendant have been in communication throughout
11 this matter and have made significant progress towards resolution of the matter. Since the filing of
12 the Complaint, Defendant has paid a substantial portion of the amounts due to Plaintiffs and the
13 parties are facilitating payment of the remaining amounts owed to Plaintiffs.

14 4. The parties jointly request a continuance of the Case Management Conference so as
15 to allow the parties to further facilitate the resolution of this matter, as both parties desire to resolve
16 this matter without the need for further litigation.

17 5. This is the first such request made by either party to this matter.

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6. There are no issues that need to be addressed by the parties at the currently scheduled Case Management Conference. In the interest of conserving costs, as well as the Court's time and resources, Plaintiffs and Defendant jointly and respectfully request that the Case Management Conference, currently scheduled for January 7, 2015, be continued for approximately forty-five (45) days, to allow sufficient time for the parties to continue their attempts to resolve this matter outside of litigation.

SO STIPULATED.

Dated: December 18, 2014

SALTZMAN & JOHNSON
LAW CORPORATION

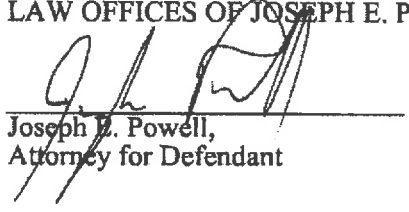
By:


Adrian L. Canzoneri
Attorney for Plaintiffs

Dated: December 18, 2014

LAW OFFICES OF JOSEPH E. POWELL

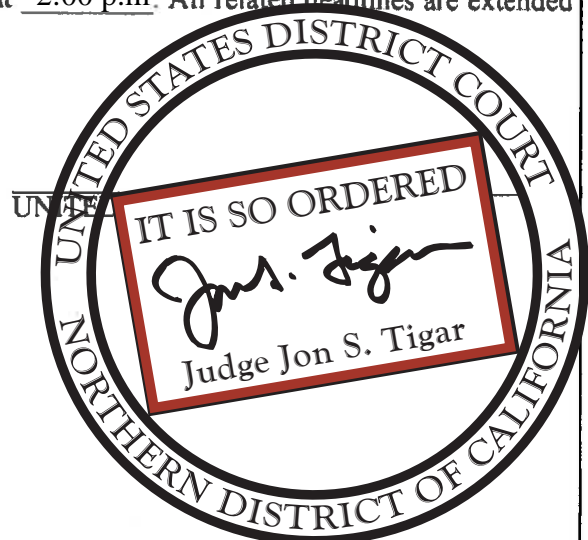
By:


Joseph E. Powell,
Attorney for Defendant

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to 02/25/2015, at 2:00 p.m. All related deadlines are extended accordingly.

Date: December 19, 2014



JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; ~~PROPOSED~~ ORDER
CASE NO.: C14-4300 JST